

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TERRENCE J. HANCOCK, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 18 C 3304
	)	
MIDWEST REM ENTERPRISES, INC.,	)	CHIEF JUDGE REBECCA R. PALLMEYER
an Illinois corporation,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant, MIDWEST REM ENTERPRISES, INC., an Illinois corporation, on July 17, 2018, request this Court enter judgment against Defendant. In support of this Motion, Plaintiffs state:

1. On July 17, 2018, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.
2. On May 2, 2019, Plaintiffs' auditors completed the audit. The audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$228,028.12. (See Affidavit of Richard J. Clarson).
3. Additionally, the amount of \$41,613.48 is due for liquidated damages (Clarson Aff. Par. 9) and \$26,531.75 is due for interest (Clarson Aff. Par. 10). Plaintiffs' auditing firm of MacNeill Accounting and Consulting, L.L.P. charged Plaintiffs \$1,600.50 to perform the audit examination and complete the report (Clarson Aff. Par. 11).

4. In addition, Plaintiffs' firm has expended \$752.37 for costs and \$6,940.00 for attorneys' fees in this matter. (See Affidavit of Laura M. Finnegan).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$305,466.22.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$305,466.22.

/s/ Laura M. Finnegan

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### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 11th day of September 2019:

Mr. Alberto Ramirez, Registered Agent  
Midwest REM Enterprises, Inc.  
2601 W. LeMoyne  
Melrose Park, IL 60160-1831

Mr. Albert Ramirez, President  
Midwest REM Enterprises, Inc.  
26W214 Pinehurst  
Winfield, IL 60190-2328

Ms. Andrea E. Gambino  
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53 W. Jackson Boulevard, Suite 1332  
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/s/ Laura M. Finnegan

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